

CHRISTOPHER J. BOWES, ESQ.

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March 26, 2021

Via ECF

Hon. John G. Koeltl United States Magistrate Judge 500 Pearl Street New York, New York 10007 Application granted. SO ORDERED

March 29, 2021 /s/ John G. Koeltl
New York, NY U.S.D.J.

Re: Hennelly v. Saul 20 Civ. 4786 (JGK)

Dear Judge Koeltl:

I am writing to request an extension of time, <u>nunc pro tunc</u>, to file plaintiff's Motion for Judgment on the Pleadings and Memorandum of Law in Support thereof. Plaintiff's papers were due to be filed yesterday. This is plaintiff's third request for an extension of time.

Due to a computer malfunction yesterday, I lost several hours of work on Mr. Hennelly's papers. I have managed to restore a backup copy, but I still need additional time to recreate the lost work. I apologize to the Court and oppposing counsel for these delays. With the kind consent of AUSA Susan Baird, I respectfully request that the Court approve the following revised briefing schedule:

March 26, 2021 Plaintiff's Motion for Judgment on the Pleadings
May 25, 2021 Defendant's Cross-Motion
June 21, 2021 Plaintiff's Reply Brief
July 12, 2021 Defendant's Reply Brief

Thank you for you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ Christopher J. Bowes Christopher J. Bowes Attorney for Plaintiff

cc: AUSA Susan D. Baird 86 Chambers Street, 3rd Floor New York, New York 10007